

# Exhibit A

Court of Common Pleas of Philadelphia County  
Trial Division

**Civil Cover Sheet**

<p>For Prothonotary Use Only (Docket Number)</p> <p><b>SEPTEMBER 2022</b></p> <p>E-Filing Number: 2209024112</p> <p><b>001161</b></p>	
PLAINTIFF'S NAME SHAREEM BROWN	DEFENDANT'S NAME MACY'S, ALIAS: A/K/A MACY'S SPRINGFIELD
PLAINTIFF'S ADDRESS 1446 N. 53RD STREET PHILADELPHIA PA 19131	DEFENDANT'S ADDRESS 1250 BALTIMORE PIKE SPRINGFIELD PA 19064
PLAINTIFF'S NAME	DEFENDANT'S NAME MACY'S, INC.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 151 W. 34TH STREET NEW YORK NY 10001
PLAINTIFF'S NAME	DEFENDANT'S NAME MACY'S RETAIL HOLDINGS, INC.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1001 STATE STREET #1400 ERIE PA 16501
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 4
COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:
CASE TYPE AND CODE 20 - PERSONAL INJURY - OTHER	
STATUTORY BASIS FOR CAUSE OF ACTION	
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)	
<div style="text-align: center;"> <b>FILED</b>  <b>PRO PROTHY</b>  <b>SEP 14 2022</b>  <b>E. HAURIN</b> </div>	
IS CASE SUBJECT TO COORDINATION ORDER? YES    NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>SHAREEM BROWN</u> Papers may be served at the address set forth below.	
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY MICHAEL-JOHN GOODNOW	ADDRESS 1101 MARKET STREET SUITE 2500 PHILADELPHIA PA 19107
PHONE NUMBER (215) 922-6073	FAX NUMBER (215) 922-5787
SUPREME COURT IDENTIFICATION NO. 41656	E-MAIL ADDRESS MJGOODNOW@MATKOFFSHENGOLD.COM
SIGNATURE OF FILING ATTORNEY OR PARTY MICHAEL-JOHN GOODNOW	DATE SUBMITTED Wednesday, September 14, 2022, 09:08 am

FINAL COPY (Approved by the Prothonotary Clerk)

**COMPLETE LIST OF DEFENDANTS:**

1. MACY'S  
    ALIAS: A/K/A MACY'S SPRINGFIELD  
    1250 BALTIMORE PIKE  
    SPRINGFIELD PA 19064
2. MACY'S, INC.  
    151 W. 34TH STREET  
    NEW YORK NY 10001
3. MACY'S RETAIL HOLDINGS, INC.  
    1001 STATE STREET #1400  
    ERIE PA 16501
4. MACY'S RETAIL HOLDINGS, LLC.  
    1001 STATE STREET # 1400  
    ERIE PA 16501

**MATKOFF, SHENGOLD, BERMAN,  
GOODNOW & ASSOCIATES, P.C.**

By: *Michael-John Goodnow, Esquire*

I.D. #: 41656

[mjgoodnow@msbglaw.com](mailto:mjgoodnow@msbglaw.com)

By: *Michael E. London*

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Philadelphia, PA 19107

(215) 922 - 6073

Filed and Attested by the  
Office of Judicial Records  
14 SEP 2022 09:08 am

E. HAURIN

**MAJOR NON-JURY  
Attorney for Plaintiff**

**SHAREEM BROWN**

1446 N. 53<sup>RD</sup> Street

Philadelphia, PA 19131

**COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY**

V.

**MACY'S A/K/A MACY'S SPRINGFIELD**

1250 Baltimore Pike

Springfield, PA 19064

&

**MACY'S, INC.**

151 W. 34<sup>TH</sup> Street

New York, NY 10001

&

**MACY'S RETAIL HOLDINGS, INC.**

1001 State Street - # 1400

Erie, PA 16501

&

**MACY'S RETAIL HOLDINGS, LLC.**

1001 State Street - # 1400

Erie, PA 16501

**SEPTEMBER TERM, 2022  
NO.: 01161**

### **CIVIL ACTION COMPLAINT**

#### **NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice or any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Philadelphia Bar Association  
Lawyer referral and Information Services  
1101 Market Street  
Philadelphia, PA 19107  
(215) 238-6300

#### **AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo a partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y comparecer a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Son avisados que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

USTED LE DEBE TOMAR ESTE PAPEL A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE A ABOGADO VA A O TELEFONEA LA OFICINA EXPUESTA ABAJO. ESTA OFICINA ABOGADO, SI USTED NO PUEDE PROPORCIONAR PARA EMPLEAR UN ABOGADO, ESTE OFICINA PUEDE SER CAPAZ DE PROPORCIONARLO CON INFORMACION ACERCA DE LAS AGENCIAS QUE PUEDEN OFRECER LOS SERVICIOS LEGALES A PERSONAS ELEGIBLES EN UN HONORARIO REDUCIDO NI NINGUNO HONORARIO.

Asociation De Licenciados Philadelphia  
Servicio De Referencia E Informacion legal  
1101 Market Street  
Philadelphia, PA 19107  
(215) 238-6300

Case ID: 220901161

1. The Plaintiff, **SHAREEM BROWN**, is an adult individual, a citizen, and a resident of the Commonwealth of Pennsylvania, residing therein at 1446 N. 53<sup>RD</sup> Street, Philadelphia, PA 19131.
2. The Defendant, **MACY'S A/K/A MACY'S SPRINGFIELD**, is a business entity amenable to suit within the Commonwealth of Pennsylvania, with a principal place of business located at 1250 Baltimore Pike, Springfield, PA 19064.
3. The Defendant, **MACY'S, INC.**, is a business entity amenable to suit within the Commonwealth of Pennsylvania, with a principal place of business located at 151 W. 34<sup>TH</sup> Street, New York, NY 10001.
4. The Defendant, **MACY'S RETAIL HOLDINGS, INC.**, is a business entity amenable to suit within the Commonwealth of Pennsylvania, with a principal place of business located at 1001 State Street - #1400, Erie, PA 16501.
5. The Defendant, **MACY'S RETAIL HOLDINGS, LLC.**, is a business entity amenable to suit within the Commonwealth of Pennsylvania, with a principal place of business located at 1001 State Street - #1400, Erie, PA 16501.
6. On or about March 1, 2021 at or around 2:15 P.M., the Plaintiff, **SHAREEM BROWN**, was lawfully in the Macy's store located in the Springfield Mall and was sitting in a chair in the shoes department, when due to the negligence and carelessness of the Defendants, was suddenly and without warning struck on the head by a heavy, metal shoe display stand, which caused her to sustain serious and permanent injuries more fully set forth herein.
7. As a result of the Defendants' negligence, the Plaintiff, **SHAREEM BROWN**, has sustained injuries including but not limited to: left side nerve damage; left palm nerve damage; cervical disc protrusions at C2-C3, C3-C4, C4-C5, and C5-C6; herniated disc at C6-C7; lumbar disc protrusion at L5-S1; lumbar disc bulges at L3-L4, and L4-L5; cervical radiculopathy, left C7; sprain and contusion of the left shoulder; possible concussion; post-

concussion symptoms; memory loss; headaches; visual impairments; unresolved cervical sprain and strain; unresolved thoracic sprain and strain; unresolved lumbar sprain and strain; shock and injury to her nerves, muscular and bones system, all of which claims may be permanent or cause a serious and permanent impairment of bodily function, and emotional, physical, and mental distress and may continue to suffer same.

8. As a further result of the Defendant's negligence, the Plaintiff, **SHAREEM BROWN**, has in the past and may in the future experience great mental, physical and emotional pain and suffering and other non-economic losses.
9. As a further result of the Defendant's negligence, the Plaintiff, **SHAREEM BROWN**, has in the past and may in the future be prevented from attending to her usual activities, duties, and occupations to her great financial detriment and loss.
10. As a further result of the Defendant's negligence, the Plaintiff, **SHAREEM BROWN**, has in the past and may in the future be caused to suffer from worry, anxiety, apprehension, and frustration.
11. As a further result of the Defendant's negligence, the Plaintiff, **SHAREEM BROWN**, has in the past and may in the future suffer from humiliation, embarrassment, and degradation.
12. As a further result of the Defendant's negligence, the Plaintiff, **SHAREEM BROWN**, has in the past and may in the future be caused to suffer loss of the pleasures and enjoyments of life.
13. As a further result of the Defendant's negligence, the Plaintiff, **SHAREEM BROWN**, has in the past and may in the future suffer loss of earnings and/or earning capacity to her great financial detriment and loss.
14. To date, as a result of the aforementioned accident, Plaintiff, **SHAREEM BROWN**, has incurred medical expenses.

15. As a further result of the Defendant's negligence, the Plaintiff, **SHAREEM BROWN**, has in the past incurred and may in the future continue to incur medical expenses in an endeavor to treat and cure herself of the injuries sustained in the aforesaid accident, for which a claim is hereby made.

**COUNT I**  
**SHAREEM BROWN V. MACY'S A/K/A MACY'S SPRINGFIELD**

16. The Plaintiff, **SHAREEM BROWN**, hereby incorporates paragraphs one through fifteen as though same were fully set forth herein, at length and in full.
17. At all times material hereto, the Defendant, **MACY'S A/K/A MACY'S SPRINGFIELD**, is the owner and/or tenant of the premises located at 1250 Baltimore Pike, Springfield, PA 19064, and were responsible by deed, contract, lease, and/or otherwise for the care, maintenance, and safety at this property, acting through their agents, servants, workmen, and employees.
18. The aforementioned negligence of the Defendant, **MACY'S A/K/A MACY'S SPRINGFIELD**, their agents, servants, workmen, and/or employees consisted inter alia of the following:
- a. Failure to mount displays in a way which they cannot fall and possibly cause injuries to those shopping;
  - b. Placing seating areas directly next to stands which they knew or should have known could fall and cause injury;
  - c. Failure to properly maintain said premises in a manner safe for those lawfully upon said premises;
  - d. Failure to take adequate and timely remedial measures, to move the dangerous condition from the walkway at said premises;
  - e. Negligently and carelessly allowing a dangerous condition to exist in said premises;

- f. Failure to properly and timely inspect said premises for hazards;
- g. Failure to post warnings of said dangerous condition;
- h. Failure to warn Plaintiff of the defect and/or dangerous condition;
- i. Failing to properly supervise, train, and instruct its agents, servants, workmen and employees;
- j. Failure to anticipate the hazard to which the Plaintiff was exposed;
- k. Failing to inspect said area;
- l. Such other negligence, carelessness and/or recklessness as may be revealed during discovery.

**WHEREFORE**, the Plaintiff, **SHAREEM BROWN**, demands judgement against the Defendant, **MACY'S A/K/A MACY'S SPRINGFIELD**, for an amount in excess of the Arbitration Limits.

**COUNT II**  
**SHAREEM BROWN V. MACY'S, INC.**

- 19. The Plaintiff, **SHAREEM BROWN**, hereby incorporates paragraphs one through eighteen as though same were fully set forth herein, at length and in full.
- 20. At all times material hereto, the Defendant, **MACY'S, INC.**, is the owner and/or tenant of the premises located at 1250 Baltimore Pike, Springfield, PA 19064, and were responsible by deed, contract, lease, and/or otherwise for the care, maintenance, and safety at this property, acting through their agents, servants, workmen, and employees.
- 21. The aforementioned negligence of the Defendant, **MACY'S, INC.**, their agents, servants, workmen, and/or employees consisted inter alia of the following:
  - a. Failure to mount displays in a way which they cannot fall and possibly cause injuries to those shopping;



- b. Placing seating areas directly next to stands which they knew or should have known could fall and cause injury;
- c. Failure to properly maintain said premises in a manner safe for those lawfully upon said premises;
- d. Failure to take adequate and timely remedial measures, to move the dangerous condition from the walkway at said premises;
- e. Negligently and carelessly allowing a dangerous condition to exist in said premises;
- f. Failure to properly and timely inspect said premises for hazards;
- g. Failure to post warnings of said dangerous condition;
- h. Failure to warn Plaintiff of the defect and/or dangerous condition;
- i. Failing to properly supervise, train, and instruct its agents, servants, workmen and employees;
- j. Failure to anticipate the hazard to which the Plaintiff was exposed;
- k. Failing to inspect said area;
- l. Such other negligence, carelessness and/or recklessness as may be revealed during discovery.

**WHEREFORE**, the Plaintiff, **SHAREEM BROWN**, demands judgement against the Defendant, **MACY'S, INC.**, for an amount in excess of the Arbitration Limits.

**COUNT III**  
**SHAREEM BROWN V. MACY'S HOLDINGS, INC.**

22. The Plaintiff, **SHAREEM BROWN**, hereby incorporates paragraphs one through twenty-one as though same were fully set forth herein, at length and in full.

23. At all times material hereto, the Defendant, **MACY'S RETAIL HOLDINGS, INC.**, is the owner and/or tenant of the premises located at 1250 Baltimore Pike, Springfield, PA 19064, and were responsible by deed, contract, lease, and/or otherwise for the care, maintenance, and safety at this property, acting through their agents, servants, workmen, and employees.
24. The aforementioned negligence of the Defendant, **MACY'S RETAIL HOLDINGS, INC.**, their agents, servants, workmen, and/or employees consisted inter alia of the following:
- a. Failure to mount displays in a way which they cannot fall and possibly cause injuries to those shopping;
  - b. Placing seating areas directly next to stands which they knew or should have known could fall and cause injury;
  - c. Failure to properly maintain said premises in a manner safe for those lawfully upon said premises;
  - d. Failure to take adequate and timely remedial measures, to move the dangerous condition from the walkway at said premises;
  - e. Negligently and carelessly allowing a dangerous condition to exist in said premises;
  - f. Failure to properly and timely inspect said premises for hazards;
  - g. Failure to post warnings of said dangerous condition;
  - h. Failure to warn Plaintiff of the defect and/or dangerous condition;
  - i. Failing to properly supervise, train, and instruct its agents, servants, workmen and employees;
  - j. Failure to anticipate the hazard to which the Plaintiff was exposed;
  - k. Failing to inspect said area;
  - l. Such other negligence, carelessness and/or recklessness as may be revealed during discovery.

**WHEREFORE**, the Plaintiff, **SHAREEM BROWN**, demands judgement against the Defendant, **MACY'S RETAIL HOLDINGS, INC.**, for an amount in excess of the Arbitration Limits.

**COUNT IV**  
**SHAREEM BROWN V. MACY'S RETAIL HOLDINGS, LLC.**

25. The Plaintiff, **SHAREEM BROWN**, hereby incorporates paragraphs one through twenty-four as though same were fully set forth herein, at length and in full.
26. At all times material hereto, the Defendant, **MACY'S RETAIL HOLDINGS, LLC.**, is the owner and/or tenant of the premises located at 1250 Baltimore Pike, Springfield, PA 19064, and were responsible by deed, contract, lease, and/or otherwise for the care, maintenance, and safety at this property, acting through their agents, servants, workmen, and employees.
27. The aforementioned negligence of the Defendant, **MACY'S RETAIL HOLDINGS, LLC.**, their agents, servants, workmen, and/or employees consisted inter alia of the following:
  - a. Failure to mount displays in a way which they cannot fall and possibly cause injuries to those shopping;
  - b. Placing seating areas directly next to stands which they knew or should have known could fall and cause injury;
  - c. Failure to properly maintain said premises in a manner safe for those lawfully upon said premises;
  - d. Failure to take adequate and timely remedial measures, to move the dangerous condition from the walkway at said premises;
  - e. Negligently and carelessly allowing a dangerous condition to exist in said premises;
  - f. Failure to properly and timely inspect said premises for hazards;

- g. Failure to post warnings of said dangerous condition;
- h. Failure to warn Plaintiff of the defect and/or dangerous condition;
- i. Failing to properly supervise, train, and instruct its agents, servants, workmen and employees;
- j. Failure to anticipate the hazard to which the Plaintiff was exposed;
- k. Failing to inspect said area;
- l. Such other negligence, carelessness and/or recklessness as may be revealed during discovery.

**WHEREFORE**, the Plaintiff, **SHAREEM BROWN**, demands judgement against the Defendant, **MACY'S RETAIL HOLDINGS, LLC.**, for an amount in excess of the Arbitration Limits.

**MATKOFF, SHENGOLD, BERMAN,  
GOODNOW & ASSOCIATES, P.C.**


  
MICHAEL JOHN GOODNOW, ESQUIRE

Case ID: 220901161

**VERIFICATION**

I hereby verify that the statements set forth in the foregoing pleading are true and correct to the best of their knowledge, information and belief.

The foregoing statements are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

  
Shaleen Brown

Case ID: 220901161